

EXHIBIT A
Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Re. D.I. 34240, 34244

ORDER GRANTING THE SEALING MOTION OF THE FTX RECOVERY TRUST

Upon consideration of the *Sealing Motion of the FTX Recovery Trust* (the “Sealing Motion”);² and this Court having jurisdiction to consider the Sealing Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Sealing Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Sealing Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and objections (if any) to relief on the Sealing Motion having been withdrawn, resolved or overruled on the merits; and upon the record of the hearing and all of the proceedings had before

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Sealing Motion.

this Court; and this Court having found and determined that the legal and factual bases set forth in the Sealing Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Sealing Motion is GRANTED as set forth herein.
2. The FTX Recovery Trust is authorized to make redactions to paragraphs 68 and 204 and note 46 of the Reply.
3. The FTX Recovery Trust is authorized to redact certain portions of Exhibits 2, 11, 23, and 50 to the Beller Reply Declaration.
4. The FTX Recovery Trust is authorized to file completely under seal Exhibits 18, 19, and 52 to the Beller Reply Declaration.
5. This Order shall be immediately effective and enforceable upon its entry.
6. This Court shall retain jurisdiction with respect to implementation of this Order.

Dated: _____, 2026
Wilmington, Delaware

THE HONORABLE KAREN B. OWENS
CHIEF UNITED STATES BANKRUPTCY JUDGE